

19:08-19:22: Relevance

21:06-21:09: Relevance

22:24-23:17: Relevance

35:17-35:20: Relevance; 407

36:20-37:18: Relevance; 407

59:20-61:08: Relevance; MIL regarding Comparative Fault

B. Goodyear's Objections to Plaintiffs' Counter Designations.

28:15-29:04: Non-responsive answer; hearsay.

III. 2.7.19 Deposition of Larry Blair

A. Plaintiffs' Objections.

Plaintiffs object to the entirety of the deposition as irrelevant pursuant to MIL regarding comparative fault. Plaintiffs further object to the playing of the video as Mr. Blair was deposed in prison for a minor drug charge and is wearing prison clothes. Accordingly, the video is unfairly prejudicial under FRE 403.

07:13-09:25: Relevance; 403; 404; 609 (testimony regarding a conviction not involving a dishonest act or false statement)

13:18-14:09: Relevance; 403; 404; 609 (testimony regarding a conviction more than 10 years old and not involving a dishonest act or false statement)

27:25-29:14: Relevance; Hearsay, MIL regarding comparative fault; MIL regarding workers compensation bar)

42:09-43:11: MIL regarding comparative fault; MIL regarding workers compensation bar)

54:09-55:21: Relevance

69:15-72:03: Relevance (there is no allegation the truck or tire was overloaded)

B. Goodyear's Objections to Plaintiffs' Counter Designations.

29:15-31:12: Objection to 30:11-31:12 for lack of foundation as Blair testified he never experienced a blown tire and has no engineering expertise.

IV. 12.4.01 Deposition of Beale Robinson.

A. Plaintiffs' Objections.

69:10-70:2: Undisclosed Expert Opinion; unqualified to give opinion

353:2-361:15: Relevance

B. Goodyear's Objections to Plaintiffs' Counter Designations.

None.

V. 7.16.02 Deposition of Joseph Zekoski.

A. Plaintiffs' Objections.

422:18-423:8: Speculation

B. Goodyear's Objections to Plaintiffs' Counter Designations.

None.

VI. 7.17.02 Deposition of Richard Olsen.

A. Plaintiffs' Objections.

34:18-35:4: Relevance (discussion about commercial tires)

133:23-135:18: Relevance

B. Goodyear's Objections to Plaintiffs' Counter Designations.

None.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was filed with the Clerk of the Court and served upon all attorneys of record using the CM/ECF system this 12th day of March, 2020.

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